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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CASE NO. 18-CR-00465 MMC
)	
Plaintiff,)	
)	
v.)	UNITED STATES' RESPONSE TO COURT
)	ORDERS REGARDING SEALING
FUJIAN JINHUA INTEGRATED CIRCUIT)	
CO., LTD,)	
)	
Defendant.)	
)	
)	
)	
)	

1 The Court has directed the United States to address Fujian Jinhua Integrated Circuit Company,
 2 Ltd.'s (Jinhua's) requests for sealing. On January 3, 2021, the Court directed the United States to file a
 3 declaration identifying any portions of Exhibit G to the Sloan Declaration in support of Jinhua's motion
 4 *in limine* 4 ("Sloan Declaration 1") that the United States believed would be properly filed under seal.
 5 *See* Dkt. 284. Also on January 3, 2021, the Court directed the United States to file a declaration
 6 identifying the portions of Exhibits B, C, E, F, I and J, if any, to the Sloan Declaration in support of
 7 Jinhua's motion *in limine* 6 ("Sloan Declaration 2") it believes are properly filed under seal. Dkt. 286.

8 Exhibit G to Sloan Declaration 1 is the expert report of Jinhua's forensic expert John Ashley
 9 ("Ashley Report") and exhibits to it. Having reviewed the exhibits to the Ashley Report, the United
 10 States concludes that certain of the exhibits are designated confidential but does not find that any
 11 portions need to be sealed, and so is not filing a declaration in support of sealing. Accordingly, going
 12 forward, Jinhua may consider these documents not confidential.

13 With respect to the Sloan Declaration 2, Exhibits B and C are the Technology Cooperation
 14 Agreement between Jinhua and UMC and a translation of it. The United States does not believe either
 15 need be filed under seal. Exhibits E, F, I and J are interrogation records and translations of them, and
 16 again, the United States does not maintain that they should be sealed and so is not filing a declaration in
 17 support of sealing. Accordingly, going forward, Jinhua may consider the documents at issue here to be
 18 not confidential.

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 21 Dated: January 10, 2022

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22 /s/
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